

EXHIBIT

1

By Hand
4:14 9/25

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
WILLIAM MURAWSKI aka and better known as
BILL MURAWSKI and all other candidates who
are similarly situated as the Plaintiff(s).

AMENDED COMPLAINT

Civil Action No: 17 CV 6859

v.

NEW YORK STATE BOARD OF ELECTIONS,
NEW YORK CITY BOARD OF ELECTIONS and
the NEW YORK CITY CAMPAIGN FINANCE
BOARD as the Defendants.
-----X

I. JURISDICTION

The Federal District Court of the Southern District of New York has jurisdiction in the above captioned complaint because of violations of the 1st, 5th and 14th Amendments to the Constitution of the United States of America; 42 U.S. Code 42 § 1986; U.S. Code 42 § 1985 (3); and the Help America Vote Act (HAVA). The causes of action in the above captioned Amended Complaint are explained in MURAWSKI'S affidavit and the Exhibits included with this Amended Complaint.

II. PARTIES

A. Plaintiff(s):

WILLIAM MURAWSKI aka and better known as BILL MURAWSKI filed with the NYCBOE as a candidate for Mayor of the City of New York in the Democratic Primary to be held on September 12, 2017 and in the General Election to be held on November 7, 2017. William MURAWSKI is a natural born citizen of the United States of America and lives at 530 West 50th Street in the Borough of Manhattan and has lived at that residence for more than thirty years. The contact telephone number for WILLIAM MURAWSKI is (917) 407-6492; email address is Information@BillMurawski.com

"Similarly situated candidates" are those persons who filed with the NYCBOE to run for city-wide and local elective offices of the City of New York and filed petitions to run in the Primary Election that were held on September 12, 2017 and who were "knocked off the ballot" as a result of the policies, procedures and rules of the NYSBOE and the NYCBOE. Contact information is unknown.

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NEW YORK STATE
BOARD OF ELECTIONS
ALBANY, NEW YORK
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B. Defendants

The NEW YORK STATE BOARD OF ELECTIONS is located at 40 NORTH PEARL STREET, SUITE 5; ALBANY, NY 122072729; the contact telephone number is (518) 474-6220.

The NEW YORK CITY BOARD OF ELECTIONS is located at 32-42 Broadway, 7th Floor New York, NY 10004; the contact telephone number is (212) 487-5400.

The NEW YORK CITY CAMPAIGN FINANCE BOARD is located at 100 Church Street, 12th Floor, New York, NY 10007; the contact telephone number is (212) 409-1800.

1. From this point hereon in, WILLIAM MURAWSKI will be referred to as "MURAWSKI"; the NEW YORK STATE BOARD OF ELECTIONS will be referred to as "the NYSBOE"; the NEW YORK CITY BOARD OF ELECTIONS will be referred to as "the NYCBOE"; and the NEW YORK CITY CAMPAIGN FINANCE BOARD will be referred to as "the FINANCE BOARD".

2. MURAWSKI requests a three judge panel in accordance with 28 U.S. Code § 2284. New York City Council District 3 was gerrymandered against Murawski as a result of the 2000 U.S. Census.

3. The signature scheme developed by the NYSBOE and NYCBOE is an arbitrary and capricious device used by political parties to eliminate persons from being placed "on the ballot" who seek to become public servants as elected officials. Further, the current policies and procedures of the NYBOE and the NYCBOE allow for the political parties to maintain control of elective offices in New York State.

4. The scheduling of primary elections by the NYSBOE and the NYCBOE violates the Equal Protection Clause of the 14th Amendment to the Constitution of the United States of America, hereinafter referred to "the Constitution".

5. The New York State Election Law violates the 1st Amendment right of the freedom of speech protected by the Constitution for those registered voters who are not enrolled in constituted political parties in the State of New York.

6. The New York State Election Law created an oligarchy in New York State and New York City. Instead of promoting and protecting the democratic process of electing representatives in a representative republic government, representatives are hand-picked by the major parties in the city and state.

7. MURAWSKI'S 1st Amendment and 14th Amendment rights protected by the Constitution have been violated by the NYCBOE and NYSBOE in city, state and local elections since 2001.

8. The NYCBOE violated MURAWSKI'S 5th and 14th Amendment protection of Due Process protected by the Constitution during the ballot access portion for attaining ballot access for the Democratic Primary that was held on September 12, 2017.

9. The NYCBOE violated MURAWSKI'S 1st Amendment right protected by the Constitution during the ballot access portion for attaining ballot access for the Democratic Primary that was held on September 12, 2017.

10. The Court is respectfully referred to Exhibit A paragraphs 1 to and including paragraph 83, which is a sworn affidavit submitted by MURAWSKI to support the allegations set forth in paragraphs 2 through 9 above.

11. The NYCBOE working in conjunction with, and is complicit with the FINANCE BOARD violates the Equal Protection Clause of the 14th Amendment to the Constitution and the Freedom of Speech protected by the 1st Amendment to the Constitution. The Court is respectfully referred to Exhibit A paragraphs 84 and 85, which is a sworn affidavit submitted by MURAWSKI to support this allegation.

12. The NYCBOE violated the Help America Vote Act ("HAVA") in the 2013 city-wide elections. The Court is respectfully referred to Exhibit A paragraphs 86, which is a sworn affidavit submitted by MURAWSKI to support this allegation.

13. MURAWSKI'S Complaint is timely filed.

14. The entirety of the sworn affidavit submitted by MURAWSKI as Exhibit A is to be considered by the Court in granting the relief requested by MURAWSKI.

WHEREFORE, MURAWSKI respectfully requests the following relief from the Court:

1. Re-run the Primary Elections held in New York City on September 12, 2017 and place MURAWSKI's name as a candidate for Mayor of the City of New York in the Democratic Primary and place the names of all similarly situated candidates on the ballot in their respective parties for the following reasons:

- a. Due Process Violations against MURAWSKI and;
- b. The signature schemes developed and implemented by the NYSBOE and the NYCBOE are unconstitutional

2. Place a Temporary Restraining Order ("TRO") on the General Election in New York City to be held by the NYCBOE on November 7, 2017 until the following are accomplished:

- a. Place MURAWSKI'S name on the ballot for the Voice of the People Party as a candidate for Mayor of New York City in the General Election that is scheduled to be held on November 7, 2017;
- b. Publish MURAWSKI'S name in the FINANCE BOARD'S Voters Guide for the Voice of the People Party (in its entirety) in the General Election for Mayor of the City of New York that is to be held on November 7, 2017.

3. Order the NYCBOE and the NYSBOE to develop a ballot access procedure such as a bond requirement that is financially reasonable for candidates to obtain ballot access that is not arbitrary and capricious.

4. Order the NYCBOE and the NYSBOE to allow those voters who are not registered in any constituted party to vote in all Primary Elections held in New York State.

5. Declare the 2013 election for mayor of the City of New York as null and void because of collusion and Constitutional violations set forth in MURAWSKI's Complaint.

6. Order the NYSBOE and the NYCBOE to have Primary Elections held in September to be held on any Tuesday in a week that is either before or after the yearly September 11th Commemoration because on September 11, 2001 both towers of the World Trade Center collapsed on the exact day that term limits were put into place for all elective offices in New York City, and as such, the healing process in New York City continues yearly every September 11th thereby distracting voters away from the Primary Elections.


7. Order the NYSBOE and the NYCBOE to schedule all primary elections for city, state and federal elections on the same day to comply with the Equal Protection Clause of the 14th Amendment to the Constitution, which is believed to also assist in saving the taxpayers approximately \$9 million dollars that is spent yearly in overtime by the NYCBOE and the NYSBOE.

8. Order the NYSBOE and the NYCBOE to develop a method within a 3 year period whereby voters can obtain a paper receipt for the ballot they cast in any election held in New York State AND that the voter can verify on the internet that all votes cast on the ballot were counted.

9. Order the Board of Elections to develop a method whereby a third, non-interested party such as the League of Women Voters can verify the votes cast in any election held in New York State.

10. Any other relief the Court deems just and proper in favor of the voters of New York State.

Respectfully,


William Murawski

Sworn to before me on this 22nd
day of September 2017

EVELYN APRIL HAMMER
Notary Public, State of New York
No. 01HA6257725
Qualified in New York County
Commission Expires March 30, 2018

April 2, 2018

